

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
: :
MARIA A. TOWNES : Debtor : Bankruptcy No. 16-16498AMC

**CHAPTER 13 STANDING TRUSTEE'S ANSWER TO
DEBTOR'S MOTION TO MODIFY PLAN POST CONFIRMATION**

Jack K. Miller, counsel for the trustee, William C. Miller, answers the Motion to Modify Plan Post Confirmation as follows:

1. The trustee will need to review amended Schedules I and J.
2. The trustee may require testimony to support this motion.

WHEREFORE, the trustee respectfully requests that the Motion to Modify Plan Post Confirmation be denied.

Respectfully submitted,

/s/ Jack K. Miller

Date: January 8, 2018

Jack K. Miller, Esquire, Staff Attorney for
William C. Miller, Esquire
Chapter 13 Standing Trustee